



September 21, 2012

Chairman Julius Genachowski
Commissioner Robert McDowell
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Innovation in the Broadcast Television Bands, ET Docket No. 10-235

Dear Chairman Genachowski, Commissioners McDowell, Clyburn, Rosenworcel and Pai:

Next week you will take the first step in implementing the important and historic legislation authorizing incentive spectrum auctions. This is a key opportunity to manage spectrum allocations and to promote mobile broadband applications in our country, as well as to ensure that public safety will have access to adequate resources to communicate during emergencies.

The UCC's historic media justice ministry, OC Inc., and the National Hispanic Media Coalition would like to raise with you some important matters which we hope will be addressed in the upcoming Notice of Proposed Rulemaking. In short, we seek to ensure that all communities—including underserved and underrepresented communities—are well served by the existing broadcast system and the new and emerging mobile wireless telecommunications infrastructure. The Commission has a legal and policy obligation to ensure that all Americans are well-served and that all Americans have an opportunity to control the licenses that are the essential building blocks to our digital media ecosystem.

Specifically, we believe the Commission should take the following action in the Notice:

- Analyze the steps that the Commission should take to ensure that Sections 309(j) and 257 of the Communications Act are appropriately implemented.
- Set forth data about the amount of spectrum controlled by small businesses or designated entities and seek comment on the impact of the proceeding on their relative stakes and its impact on competition;

- Seek comment on how bidding credits or other mechanisms could be used to promote participation by small businesses in the incentive auction;
- Seek comment on whether the size or other characteristics of mobile wireless companies impacts broadband adoption by underserved communities; and
- Seek comment on business models, such as mobile virtual network operators (MVNOs), which could promote the participation in mobile wireless by smaller companies.

In addition to items that should be included for comment in the notice, the Commission should take additional administrative steps to build on its existing efforts to educate licensees about the potential impact of the auction. The Commission should perform extensive outreach to small and mid-sized television stations to ensure they do not feel compelled to exit broadcasting because of misinformation or other reasons. A fully transparent process from start to finish will ensure that each licensee can make an informed decision about whether and to what extent they wish to participate in the auction. Similarly, the Commission should conduct outreach to small entrepreneurs, particularly those owned by people of color and women, to encourage them to participate in the spectrum auction once it occurs.

While people of color are relying increasingly on mobile wireless for their broadband needs, wireless broadband services are not yet adequate for many uses—particularly for those uses that could most promote economic well-being for at-risk populations, such as online education, job applications and public benefits. Women and people of color deserve to participate equally, not just in the use of wireless services, but in the ownership of the companies that offer service. The Commission should ensure, from the beginning, that this proceeding does everything possible to promote such outcomes.

Sincerely,



Earl Williams
Chair
United Church of Christ, Office of Communication, Inc.



Alex Nogales
President & CEO
National Hispanic Media Coalition